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District of Oregon

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Attorneys for the United States

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**MEDFORD DIVISION**

**UNITED STATES OF AMERICA,**

1:24-mc-239

**Plaintiff,**

**v.**

**2020 FORD F-350, VIN  
1FT8W3BT9LEC21971, ITS TOOLS  
AND APPURTENANCES, SNAKE  
RIVER UTILITY TRAILER, VIN  
5PTBD1426M1040008, AND \$6,661.00  
IN UNITED STATES CURRENCY, *in  
rem*,**

**UNOPPOSED MOTION TO  
EXTEND 90-DAY PERIOD  
PURSUANT TO  
18 U.S.C. § 983(a)(3)(A)**

**Defendants.**

Pursuant to Local Rule 7-1, counsel for the United States certifies that I have contacted Justin Rosas, attorney for claimant Valentin Daskalov, who concurs with this extension.

On December 5, 2023, Valentin Daskalov filed a claim in a non-judicial civil forfeiture proceeding by the U.S. Customs and Border Protection to a 2020 Ford F-350, a Snake River Utility Trailer, and \$6,661.00 in U.S. currency seized from Valentin Daskalov on or about September 21, 2023.

**Unopposed Motion to Extend 90-Day Period**

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No other person filed a claim in the administrative forfeiture proceeding.

As provided in 18 U.S.C. § 983(a)(3)(A), the United States and Valentin Daskalov, agree to extend the time in which the United States will file a complaint for forfeiture against the 2020 Ford F-350, Snake River Utility Trailer, and \$6,661.00 in U.S. currency or to obtain an indictment alleging that the assets are subject to forfeiture. Valentin Daskalov agrees that the deadline by which the United States shall be required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture shall be extended to Tuesday, April 9, 2024.

Valentin Daskalov agrees that until the United States files a complaint for forfeiture against the assets and/or obtains an indictment alleging that the assets are subject to forfeiture, or until April 9, 2024, or until the parties reach a settlement regarding the property, whichever occurs first, the property shall remain in the custody of the United States and Valentin Daskalov shall not seek its return for any reason in any manner.

DATED: March 4, 2024.

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

*s/ Judith R. Harper*  
**JUDITH R. HARPER**  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have made service of the foregoing Motion to Extend 90-Day Period and a proposed Order on the party herein by sending via email on March 4, 2024, to:

Justin Rosas  
[justin@justinrosas.com](mailto:justin@justinrosas.com)  
Attorney for claimant Valentin Daskalov

*s/Dawn Susuico*  
DAWN SUSUICO  
Paralegal